

Federal Defenders OF NEW YORK, INC.

Southern District
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MEMO ENDORSED

Southern District of New York
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July 6, 2022

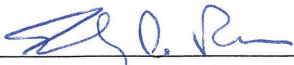
VIA ECF and EMAIL

Honorable Edgardo Ramos
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007
c/o: ChambersNYSDRamos@nysd.uscourts.gov

**Re: United States v. Erik Ciriaco
21 Cr. 450 (ER)**

The bail condition of curfew with location monitoring
is hereby removed.

SO ORDERED.



Edgardo Ramos, U.S.D.J
Dated: 7/6/2022
New York, New York

Dear Judge Ramos:

With the consent of the Pretrial Services Agency, I write to respectfully request that the Court modify Mr. Ciriaco's bail conditions to remove the condition curfew with location monitoring. Pretrial reached out to defense counsel about putting in this request because of Mr. Ciriaco's sustained compliance on Pretrial release.

On May 13, 2021, Magistrate Judge Sarah Netburn imposed, inter alia the following bail conditions upon Mr. Trippitelli: a \$75,000 personal recognizance bond cosigned by two FRPs; travel limitations to SDNY and EDNY; surrendering of all travel documents (with no new applications); Pretrial Supervision as directed by PTS; Home detention and location monitoring; Mr. Ciriaco's fiancé was to serve as a third-party custodian; and that Mr. Ciriaco was to complete a detox program at the direction of PTS. On December 15th, 2021, Your Honor granted a bail modification taking Mr. Ciriaco off home detention and placing him on curfew enforced by location monitoring.

Mr. Ciriaco has been doing exceptionally well on pre-trial release. He completed an in-patient detox program, and now regularly attends outpatient programming at Samaritan Daytop Village. He is enrolled in college and holds steady employment. Pretrial is in support of this modification because Mr. Ciriaco "continues to work, attend school, and participate in his treatment sessions."

Respectfully Submitted,

Zawadi Baharanyi, Esq.
Assistant Federal Defender
Tel: 212-417-8735

cc: AUSA Kaylan Lasky
Pretrial Officer Ashley L. Cosme